

## **Review Policy For Education Versus Recoupment**

### **Purpose:**

Provide detailed instructions for determining when to educate a provider and when to seek recoupment for documentation errors or omissions

### **Identification of Roles:**

IME PI—identify documentation errors and omissions, send appropriate letter  
State Policy – Approve PI determination to educate or seek recoupment

### **Performance Standards:**

None

### **Path of Business Procedure:**

A PI review can be initiated in a variety of ways including quarterly selection through MMIS algorithms, random sample from data warehouse queries or through referrals from internal or external sources. In most cases, medical records are requested from the provider to verify that payment was made correctly and that the provider has the proper documentation to support the services billed.

At times, this record review will identify that a provider has not met the documentation standards outlined in the Iowa Administrative Code or the Provider Manuals. These shortcomings in the documentation can lead to either an educational or a findings letter requesting recoupment of reimbursement made to the provider.

The determination as to whether to educate or recoup is based on whether the error affected the amount paid.

Some examples of errors that would not affect payment:

- Lack of caregivers signature
- Lack of caregivers credentials
- Lack of all patient identifying information
- Not properly completing CDAC daily service logs

Some examples of errors that would affect payment:

- Units billed don't match units documented
- Procedure billed does not match documentation
- Billing for services not approved

In a situation where it has been deemed appropriate to educate a provider, a letter detailing the findings quoting the Iowa Administrative Code (IAC) reference not followed is mailed. The provider is then subject to future review to ensure that they have

Initiated the necessary corrections to conform with the IAC. If a follow-up review indicates the same issues as were noted in the previous educational letter, PI will issue a findings letter and request recoupment.

All findings whether they are educational or for recoupment purposes are presented and agreed upon by State Policy staff prior to any letters being mailed. State personnel have the final say on whether PI will educate or recoup for the issue discovered.

**Forms/Reports:**

None

**RFP References:**

6.1.2.2.6

**Interfaces:**

Program Integrity  
State of Iowa Policy

**Attachments:**

N/A